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ABSTRACT

The purposes of this paper are four-fold: (1) to delineate the principal aims and policy objectives of Office of Management and Budget Forms Clearance (OMB FC), as embodied in Federal legislation and executive directives since 1942; (2) to identify the major current thrusts of OMB FC; (3) to suggest possible future policy directions of OMB FC, within the context of broader governmental activity relating to Federal research practices; and (4) to document various policies, procedures, and guidelines which pertain to Forms Clearance in both the OMB and the Education Division (i.e., principally the National Institute of Education and U. S. Office of Education) of the Department of Health, Education and Welfare (DHEW). The first part of the paper focuses mainly on the first three objectives cited. The second part encompasses the fourth objective of the paper and is being issued in the form of a compilation of materials about Forms Clearance under a separate title and is mainly oriented to the evaluation practitioner with responsibilities for preparing Forms Clearance packages, monitoring the review process, and generally facilitating the OMB clearance process. (Author/MV)

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AN EXAMINATION OF OMB FORMS CLEARANCE AIMS, POLICIES AND PROCEDURES

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AN EXAMINATION OF OMB FORMS CLEARANCE AIMS, POLICIES AND PROCEDURES

Purposes

The purposes of this paper are four-fold: (1) to delineate the principal aims and policy objectives of Office of Management and Budget Forms Clearance (OMB FC), as embodied in Federal legislation and executive directives since 1942; (2) to identify the major current thrusts of OMB FC; (3) to suggest possible future policy directions of OMB FC, within the context of broader governmental activity relating to Federal research practices; and (4) to document various policies, procedures, and guidelines which pertain to Forms Clearance in both the OMB and the Education Division (i.e., principally the National Institute of Education and U. S. Office of Education) of the Department of Health, Education and Welfare (DHEW).

This paper is divided into two distinct and physically separate parts. The first part focuses mainly on the first three objectives cited, and is represented in this writing. The second part encompasses the fourth objective of the paper and is being issued in the form of a compilation of materials about Forms Clearance under a separate title, "A Handbook on Forms Clearance Policies and Procedures for Federal Education Contractors." The Handbook is mainly oriented to the evaluation practitioner with responsibilities for preparing Forms Clearance packages, monitoring the review process, and generally facilitating the OMB clearance process. The table of contents for this Handbook is attached to this paper as Appendix A. In the first part of the paper, Forms Clearance is viewed from a goals/policies perspective, whereas the Handbook views FC from a process-implementation perspective.

Background

OMB Forms Clearance is not a new phenomenon. For thirty-five years the OMB and its predecessor, the Bureau of the Budget, have reviewed forms

and plans for the collection of information from the public by most Federal agencies. Serious interest in FC by Federal education contractors is a recent phenomenon, and has been brought about by recognition of increased administrative as well as substantive complexity in the FC review process. Newly introduced FC regulations and requirements relating to such issues and problems as increasing government paperwork and red-tape, mounting burden on the public in meeting government information requests, invasion of personal privacy by intrusive government surveys and questionnaires, access to information maintained by government on individuals, and public disclosure of government-collected information, have caused uneasiness, confusion, and concern within the educational R,D,D&E community. Other pressures specifically affecting data acquisition activities in education have built up since the early 60's and have caused both substantive and procedural revisions in the Education Division FC system. A recent memorandum from Mr. Joe Schneider (1976) to the 18-member CEDaR organization issued the following advice in response to new FC directives: "If you must get your instrument cleared, do it quickly. The longer you wait, the higher the risk that you will be too late." The fear, of course, is that FC will be more difficult, even impossible to get in the not-so-distant future. The implications of new FC policy initiatives for management of evaluation studies, for planning and developing data collection methods, and for implementing evaluation plans in a timely and effective manner have hardly been considered.

The concern for FC is not unique among Federal education contractors. A recent staff study prepared by the Committee on Post Office and Civil Service (1977) under the direction of Richard Tauber criticized OMB FC for the "lack of well understood standards for review," the "lack of understanding of most persons of the total clearance system which involves the agencies and departments as well as OMB," and for "no management control over the total

system so that forms or questionnaires can take upwards of a year or more in clearance" all without facing up to the major issues which FC is mandated to address (p. 7-8). Telephone interviews conducted recently by the authors with selected evaluators in R&D institutions revealed a wide variety of views concerning the aims of FC, a lack of basic information about FC policies and review procedures in both the OMB and in the Division of Education (DHEW), and in some cases intolerably long delays in getting final OMB approval for proposed instruments and data collection plans. For some contractors contacted, the FC process resulted in increased costs in money, time, professional resources, and/or emotional frustration, the costs of which were not insignificant.

In short, the OMB FC system, and its sub-system in the Education Division, are presently in a state of flux, with immediate and long-term implications that are difficult to discern for Federally-sponsored research generally and for educational evaluation in particular. It is hoped that this paper will provide a basis for examining these implications.

Methods

There were four primary sources of information for this paper and the Handbook: (1) written documents supplied by senior Government officials closely connected with FC in the OMB and in the Education Division, (2) experience of recently moving two instruments through the Forms Clearance process, (3) telephone interview-discussions with selected educational evaluators and administrative staff within various R&D institutions whose primary source of funding is from the Education Division (DHEW), and (4) interview-discussions with FC officials in the OMB, NIE, and USOE held during the first week of March, 1977 in Washington, D. C. These sources of information provided insights into FC from both the Federal Government and education contractor perspectives. The late timing of interviews held in Washington was advantageous in allowing

important documentation and discussion of events as recent as February, 1977 to be included in this paper. The disadvantage was in not allowing a sufficient period of reflection over what we had learned and enough follow-up time to pursue additional questions. The conclusion section in this paper will set forth only a preliminary set of observations and questions for future inquiry.

OMB FC: Principal Goals

The principal authority for OMB FC is derived from the Federal Reports Act of 1942 (P.L. 77-831)[1] which declares the OMB's general authority to review data collection forms and plans proposed by federal agencies:

> No Federal agency shall conduct or sponsor the collection of information, upon identical items, from ten or more persons (other than Federal employees as such) unless, in advance of adoption or revision of any plans or forms to be used in such collection, (a) The agency shall have submitted to the Director such plans or forms, together with copies of such pertinent regulations and other related materials as the Director shall specify; and (b) The Director shall have stated that he does not disapprove the proposed collection of information (Sec. 3504).

The Act further states that

> ... the Director is authorized within his discretion to make a determination as to whether or not the collection of any information by any Federal agency is necessary for the proper performance of the functions of such agency or for any other proper purpose (Sec. 3505)

This latter authority has not been generally understood or accepted by Federal agencies and contractors alike. Questions are sometimes raised about the right of OMB to examine proposed data collection activities on grounds of whether they are "necessary" or essential. The criteria promulgated by the OMB for review of forms/plans (see Section II, Part B of Handbook) suggest that data justification is a matter of determining an agency's statutory

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[1]This Act was later modified by the Trans-Alaska Pipeline Act of 1973 which exempts the Government Accounting Office, independent Federal regulatory agencies, the government of the District of Columbia and the territories and possessions of the U. S., and their various subdivisions from meeting FC requirements.

obligation to collect data and of determining redundancy (availability of data from existing sources) in the request rather than the worth of an agency's program or project.

From the viewpoint of establishing the major objectives of FC, Section 3501 of the FRA is the most illuminating:

> Information needed by the various Federal agencies should be obtained with a minimum burden upon business enterprises (especially upon small business enterprises) and other persons required to furnish such information, at a minimum of cost to the Government, that all necessary duplication of efforts in obtaining such information through the use of reports, questionnaires, and other such methods should be eliminated as rapidly as practicable, and that information collected and tabulated by any Federal agency should insofar as is expedient be tabulated in a manner to maximize the usefulness of the information to other Federal agencies and the public.

In summary, based on the FRA of 1942, OMB FC may be said to be primarily concerned with meeting the following objectives:

(1) eliminating unnecessary duplication of government efforts in obtaining information from the public,

(2) minimizing the costs of obtaining such information,

(3) minimizing the burdens upon those furnishing information to Federal agencies, and

(4) maximizing the usefulness of the information gathered to both the Federal government and the public.

The most recent set of OMB guidelines aimed at accomplishing reductions in public reporting burden are directed to ensure more effective implementation of these objectives of the FRA.

Two additional points are worth noting. One is that the first three objectives stated are intended to protect the public interest against excessive and frivolous data demands by the Federal government which are costly in terms of both taxpayers money and time. The fourth objective relates to a more positive function, that of promoting the public welfare through encouraging greater sharing of information among the various Federal government

agencies and between the government and the public itself. The second point is that the question of maximizing data usefulness (i.e., the fourth objective) naturally raises the concern for the technical quality of data collection methodology, including both the plan, design, and the forms themselves. OMB review criteria, which can be examined in the Handbook (Section II, Part B), are quite specific, for example, in the technical aspects of survey research methodology.

Enacted by Congress in 1950, the Budget and Accounting Procedures Act (BAAPA) authorized the OMB to "develop programs and to issue regulations and orders for the improved gathering, compiling, analyzing, publishing, and dissemination of statistical information for any purpose by the various agencies in the Executive Branch of the Government (Sec. 103)." OMB was also directed to ensure that sound statistical standards in survey design and statistical procedures in general are maintained. On May 3, 1974, the OMB issued standards and guidelines to achieve the objectives of the BAAPA (OMB, 1974) to be followed by agencies in the Executive Branch as well as by contractors and grantees. The standards and guidelines were intended to achieve greater efficiency in the design and conduct of statistical surveys, reduction in the reporting burden on respondents, greater uniformity and comparability among statistical series and studies, and improved accuracy of Federal statistics. The two most pertinent parts of these standards and guidelines are Exhibits A and B which relate more closely to the first two objectives of FC as previously cited. Exhibit A "Standards for Statistical Surveys" promulgates standards in seven categories of statistical survey research. Exhibit B "Standards for the Publication of Statistics" delineates standards in six categories which bear on the publication of statistical data. The standards enumerated in Exhibit A bear a close relationship to currently operative criteria in the clearance and review process.

The BAAPA of 1950 also gives the OMB considerable authority for the centralized planning and coordination of statistical programs. While FC itself is not specifically designed to perform planning and coordination functions, it tends to be viewed both inside and outside OMB as a device which can contribute to improvement in data-based policy formulation and planning at the highest levels of management within Federal government agencies. The Statistical Policy Division (SPD) of the OMB, of which Forms Clearance is a unit or a function, is charged overall with taking leadership in this area. The principal concept of FC as now operating in its simplest form appears to be generally that of controlling and regulating the number of report forms rather than planning/coordination of Federal statistical programs for management purposes.

To summarize, the FRA of 1942 and the BAAPA of 1950 establishes the authority of the OMB to achieve minimal burden on individuals and respondent groups in data collection efforts sponsored by the Federal government, to minimize the cost of such data collection activities, and to maximize the usefulness of data collected through application of sound statistical standards and research practices.

Current FC Thrusts

In October 1975, the OMB issued the results of a study (Lowry, 1975) attempting to assess the burden of reporting to the Federal government during the period from 1942-1975. Though the report recognized and discussed the difficulties of measuring reporting burden, its major findings appear to be reasonable: (1) between 1953 and 1975 the number of OMB approved repetitive Federal Reports remained almost constant, varying only ten percent up or down from 5,000 a year; (2) from 1966-1973, however, the number of individual responses to those reports increased 83 million; (3) there are actually

64 million more people filling out reports since 1968; and (4) reporting time (i.e., the number of hours people spend completing forms) rose more sharply during 1966-1973 than either report numbers or responses--from 112 million hours in 1966 to 177 million hours in 1973 to 129 million hours through June 1975.

Shortly following the Lowry Report, President Ford on March 1, 1976, directed OMB Director James Lynn "to assume personal responsibility for achieving the purposes of the Federal Reports Act, insofar as your agency is concerned."

The President's remarks continued:

> I regard this as a critical organizational step to assure continuing and effective attention to controlling and reducing the heavy public impact from government data collection. I expect prompt results from this effort. Specifically, I expect the number of reports which collect information from the public to be reduced at least ten percent by next June 30.

(This directive is somewhat curious in light of the OMB findings as just reported, indicating that the most difficult problem was not related to the number of forms but rather to reporting hours and number of responses).

On March 2, 1976, the OMB Director, James T. Lynn, issued Circular No. A-40, Attachment A (Revised), and a set of guidelines (OMB, 1976) to implement the President's objective. As of March 8, 1976, every request for clearance of a proposed new report, of a revision to an existing report, and for continued use of an existing report was expected to conform to these guidelines for preparing a request for clearance. The applicable sections of No. A-40 are quoted as follows:

> To minimize the reporting burden on respondents and to improve government efficiency, each Federal agency will consider and determine, in connection with each plan or report form submitted, whether the proposed plan or report form exceeds the limits of reasonable need or practical utility, either with respect to number of respondents, frequency of collection, or number and difficulty of the items, and whether all of the items of information to be furnished or recorded are essential to the central purpose of such plan or report form. (Sec. 4, paragraph a)

> Special consideration will be given to the burden on individuals, small businesses, and other organizations with limited clerical, financial management, and statistical staffs which employ fewer than 100 persons. Individuals, small businesses, or other small organizations should not be called upon to spend more than one-half hour in responding to a request for information from a Federal agency. Agencies will be expected to make a specific justification for any data collection plan or instrument which requires more than one-half hour from these respondents. (Sec. 4, paragraph c)

To ensure accountability and effective compliance with the intent of these guidelines, a new revision of the Standard Form 83 "Clearance Request and Notice of Action" (see Section II, Part E of Handbook) will contain a statement of certification which must be signed by the approving official for the Federal agency clearance official that, among other things stated, the data collection form under review "represents the minimum burden on respondents consistent with the need for information."

It appears that President Ford's March 1 directive was taking hold, for in a Cabinet meeting on July 23, 1976, the President reported that he was pleased that the objective of reducing the number of Federal reporting forms had been achieved, although the reporting burden had increased.

On July 23, 1976, President Ford issued another major policy directive which set as a goal for 1977 a five percent reduction in the hours required to respond to the Government's request for information from the public. A further goal of an additional 15-20 percent reduction in reporting burden by the end of FY 1978 was also set. These goals would be attained by establishing ceilings for the number of repetitive and single-time reports for each department and by implementing a set of guidelines (see Section II, Part D of Handbook) which aim to control the number of reports as well as the reporting burden associated with Federal agencies and departments. These guidelines were issued by the OMB on September 1, 1976. Specific objectives were established for reducing public reporting to Federal agencies:

1. establish ceilings of 4700 repetitive reports and 600 single-time reports for agencies in the executive branch, which breaks down to 850 repetitive reports and 230 single-time reports for DHEW,

2. reduce the burden of public reporting by seven million hours by September 30, 1977 associated with repetitive reports and to ensure that the burden of reporting associated with single-time reports is no higher on September 30, 1977 than it was on June 30, 1976,

3. to recommend changes in legislation which would achieve an additional 20 million hours reduction in reporting burden subsequent to September 30, 1977.

The next key event occurred shortly after President Carter took office, when the Office of the White House Press Secretary issued a release on February 16, 1977 of a memorandum from President Carter to all Heads of Executive Departments and Agencies. The full text of this memorandum is quoted below:

> As I outlined in the Cabinet meeting on Monday, January 24, I am determined to improve the efficiency and effectiveness of the Executive Branch. As part of this improvement, I place a high priority on reducing the burden which reporting to the Federal Government places upon the American public.
>
> My predecessor launched a program to secure a modest five percent reduction in reporting burden by September 30, 1977. I am dismayed to learn that the executive departments and agencies have made virtually no progress toward the achievement of that goal.
>
> To assure that this matter receives your continuing attention, I want you to assume personal responsibility for the successful fulfillment of this task and for achieving the purposes of the Federal Reports Act as they relate to your agency. You may delegate authority, but any such delegation must be unambiguous and must run directly to yourself.
>
> Please determine personally:
>
> (a) How many reports does my agency receive?
>
> (b) How many can be combined or eliminated?
>
> (c) How can they be simplified?
>
> (d) Can less frequent reports serve adequately?
>
> (e) Can major departments, agencies and sub-agencies share the same report?

> I do not look upon the task of reducing the reporting burden on the public as a one-shot campaign. It is a continuing problem. Routine efforts to deal with it will not suffice. You should review your agency's data collection activities to find ways of carrying out your program responsibilities in a manner which will reduce the paperwork burden on the public.
>
> Assess reports now required by law. You should develop recommendations for changes in legislation which might permit further reductions in reporting in the future.
>
> I have assigned the Director of the Office of Management and Budget responsibility for exercising general oversight over the reporting burden reduction program. When possible, apply to existing forms the OMB restraints on new forms and reports.
>
> I anticipate your wholehearted and enthusiastic support in achieving these goals. I want each of you and your staff to cooperate fully with the Commission on Federal Paperwork, which is pursuing a broad inquiry into matters relating to paperwork generated by Federal agencies and its impact on the public.
>
> Finally, report to OMB by March 31 the goal of your agency for reduction of required reporting which will be achieved by September 30, 1977, plus other recommendations concerning legislation and cooperation with other agencies.

That statement is hardly ambiguous as to the intentions of the new Administration, at least with respect to the "burden" issue. On the day following the President's directive, Bert Lance, the new OMB Director, reissued in almost the identical form (with minor changes) the September 1 guidelines as mentioned previously. The recency of these events and the priority which the present Administration is giving to the issue of federal reporting burden make a compelling case that FC will continue to play a strong, if not stronger, role in relation to federally-sponsored research/evaluation in the next four years. Can anything be said now about where OMB FC is heading in the next few years?

Future Directions in OMB FC

Judging from the previous discussion, the reporting burden issue will be a major concern of OMB FC. There are indications that OMB FC will take

on new and broader responsibilities both in terms of accomplishing reductions in national reporting burden and of making better use of information gathered by the Federal government. The work of the Paperwork Commission cited in President Carter's memorandum, and two other recent studies, one known as the "Tauber Report," and the other as the Peat, Marwick, Mitchell & Co. evaluation report, suggest a new emerging role concept for OMB FC.

Paperwork Commission. Established two years ago, the Commission on Federal Paperwork is a 14-member bipartizan body including representatives of the Congress, the Executive Branch, State and local governments, and the private sector. Problems on which the Commission is working affect virtually the entire nation. They range in scope from a simple proposal that could eliminate a form required of 200,000 Americans who make wine at home, to a complex plan for standardizing the paperwork of 41 separate welfare agencies at a projected saving of nearly six billion dollars a year. "Our goal is not only to cut unnecessary paperwork and red tape, but to bring about organizational and policy reforms necessary to make sure we are never again so overburdened"(Paperwork Commission, 1976). The OMB program to reduce the number of Federal forms and the workload they cause is presently being closely coordinated with the Commission's work. It should be added that the newly established Education Data Acquisitions Council in the Education Division of DHEW (see Section I of Handbook) also appears to be working in concert with the Paperwork Commission.

At least one proposal of the Commission has been formulated in the area of Education; it is aimed at reducing education reporting and recordkeeping requirements in the U. S. Office of Education. Expected results of the proposed study include:

1. An identification of similar or identical requests for education information from multiple Federal agencies, and the

development of policy recommendations to identify duplication, reduce duplication and improve inter-agency coordination,

2. An identification of information requests growing out of coming Federal legislation, as well as, new Federal policy concerns,

3. The reduction of reporting burdens growing out of the management of Federal education programs, such as the elimination of unneeded forms; and the development of certification procedures for education grant applications, and state and local plans required for education agencies by the Office of Education,

4. The development of testing of agency mechanisms and techniques to ensure that Federal, state, and local cooperation is achieved in the collection and utilization of education information, and

5. The development and testing of mechanisms and techniques to ensure that the Commission on Federal Paperwork developmental efforts are incorporated into agency practice. (Commission on Federal Paperwork, no date)

In contrast to the FC strategy of simply reviewing and clearing requests on a form-by-form basis, the Paperwork Commission is seeking to achieve similar objectives as FC by improving coordination among data collection requests from Federal agencies, ascertaining data impact of Federal legislation which creates data requirements, and facilitating cooperation among data users following data collection. In short, the difference in strategy is between creating FC leverage points at the beginning and end of the research activity cycle, a la' Paperwork Commission, rather than only at the middle of the cycle (instrument development phase) a la' OMB FC. The Tauber Report, to be discussed briefly, recommends a similar approach as the Paperwork Commission to fulfilling FC objectives.

Tauber Report. Issued on January 28, 1977, the so-called Tauber Report is a discussion of issues related to the coordination of Federal statistics gathering programs, and is the result of hearings conducted by the House Subcommittee on Census and Population during March and April 1976 (Committee on Post Office and Civil Service, 1977). The main thesis of this report is that the Federal government needs an effective mechanism to coordinate and plan

data requests, to reduce the burden and cost of data collection on the American public, and to develop more effective ways of utilizing (i.e., analyzing and disseminating) information. According to the Report, much of the blame falls on the Congress for giving too little attention to the data implications of legislated requirements for program reporting, for applications for participation in programs, and for mandated studies and reports. The Report suggests that OMB FC should not only be concerned with the maintenance of survey standards and the avoidance of unnecessary respondent burden, but also with agency functions, such as the storing, processing, and dissemination of program data, and the construction of analytical models. In short, the forms review function should not be considered separate from the planning and coordination of the Federal statistics system.

One of the specific recommendations of the Report is to establish (or re-establish) a single clearance office in the OMB with broader responsibility than simply conducting a form-by-form review--its goal would be better management of the Federal government's data acquisition efforts and better coordination of Federal statistical activities in general.

In the last two years, the OMB has taken steps to strengthen the planning and coordination function spoken about in the Tauber Report. As this pertains to FC in particular, the findings and recommendations of an evaluation study on OMB FC are revealing.

Peat, Marwick, Mitchell & Co. Report. In March 1975, the results of an extensive examination of the FC process were reported. Some of the major findings of the study are summarized:

1. The current clearance process functions in a reactive mode. It responds primarily to requests for clearance. OMB is thus involved in perfecting a report form and not in developing an effective reporting system for closely related subject areas. The major sources of new reporting requirements, e.g., Congress and executive departments, function independently of the clearance

function. There is now no effective mechanism for introducing into the initiation and development stages of reporting requirements information on existing reporting and guidance on how to minimize burden associated with new requirements. Since new requirements are the major source of reporting burden, a major deficiency in the current clearance process is its inability to become involved at the initiation stage.

2. The clearance process does not appear to function effectively in some departments and agencies which initiate, develop, and implement reporting requirements. Some departments have well-developed clearance functions which carefully scrutinize requests for clearance. Certain departments do not have either the professional skills or the staffing necessary for clearance activities. This is reflected in a lack of effective, early coordination with OMB in the initiation of new requirements. Lack of coordination on information sharing among departments during the development of reporting requirements and the submission of requests for clearance which are not well-supported, methodologically sound, and/or well-documented appears to be evident in some departments.

3. The clearance process does not provide for after-the-fact assessment of the utility and meaningfulness of data accumulated through reporting requirements. Once an initial determination of need is made and the form approved, it seems to be routinely extended (unless some open issue remains or a change is made on the form). The process does not appear to provide for an indepth review of utility at the time of extension. Unless report forms, both mandatory and voluntary, which have relatively low utility are eliminated from the inventory of reporting requirements, there is only limited opportunity to reduce the reporting burden.

The "ideal" FC process, as proposed by Peat et. al. would focus on controlling the burden at the initiation stage by assessing the potential impact on the burden of new reporting requirements, at the development stage by expanding the role of coordinating Federal information-sharing activities, and at the implementation stage by increasing surveillance over the utility and meaningfulness of current report forms; the ideal process would also see a more responsible role for other groups which influence Federal reporting. In essence, the clearance by OMB of individual report forms would no longer be the predominant function; it would become more active in curtailing new reporting requirements where they originate, in coordinating Federal data acquisition activities, and in ensuring that data collected are effectively utilized.

Underlying the findings and recommendations of the Paperwork Commission, the Tauber Report, and the Peat et al. evaluation study appear to be a set of basic assumptions about future government-society relationships: that national needs/problems will continue to beg large-scale innovative solutions and that problem-solving will continue to be a major focus of government activity; that information requirements for such problem-solving endeavors will continue to be demanding in terms of cost, quantity, and quality; and that the countervailing pressure to reduce the role of government in American society will remain strong, but so will the tendency of government to legislate solutions to problems of society which require the collection of vast amounts of information from the public.

How or if OMB FC adopts new role concepts in order to achieve the objectives set down by the Federal Reports Act of 1942 and the Budget and Accounting Procedures Act of 1950 cannot be accurately determined. And the future implications for Federal education contractors, or even Federal contractors generally, are very elusive.

Conclusions

OMB FC has been characterized in the past two years by a rapid succession of new, more stringent regulations and guidelines aimed at accomplishing objectives set forth more than three decades ago. The future of FC will undoubtedly bring further changes, which would appear to have far-reaching consequences. The recency of such events on the FC scene and the lack of experience with the "new" system make it impossible to foretell with any degree of certainty what those consequences might be for the nature and extent of Federally-sponsored educational research/evaluation. If FC achieves its objectives, there should be fewer, shorter, "better," more useful, and less frequently used forms collecting data from fewer respondents; ultimately, there should be growth in the substantive knowledge base of applied social

science and more effective and efficient governmental programs to serve the American public. We can imagine many more possible outcomes.

We can imagine, for example, that some future proposed data requirements in education which are deemed by proponents as reasonable in demand and significant for national policy (or for any other purposes) might be jeopardized by pressures to cut back on public reporting; we can imagine more parties outside of the educational arena involved in the process of deciding the scope as well as the substance of future education data acquisition, parties such as the Congress, the OMB, non-education Federal agencies, and respondent and data user groups; we can imagine, as a result of more diverse input, education and government value priorities as well as technical research issues, becoming prominent in the context of measuring how much data are reasonable and necessary to collect; we can imagine a much more active role for contractors in the FC process (see Section IV of Handbook for role specifics); we can see the need for FC training "workshops" and FC specialists among evaluators in the educational contractor marketplace; we can imagine achieving greater efficiency in implementing data collection plans, and perhaps new practices or techniques emerging in the evaluation field that would increase participation of sample groups in evaluation studies or that would reduce respondent burden and other negative effects of evaluation; we can forsee increased institutionalization of FC aims and a deeper awareness of the problems addressed by FC throughout the total Federal government structure, and possibly throughout state and local government which account for a major, largely uncontrolled source of reporting requirements. (The Federal Reports Act embraces only 18 percent of all sources of reporting requirements, as estimated by Peat et al., 1975).

We can also imagine more regulation and control over evaluation studies from the conceptualization to the implementation through the follow-up stages;

we can imagine greater procedural complexity, higher costs and more time associated with getting data collection plans processed and approved; furthermore, it's possible that one consequence of FC would be to lower rather than raise the quality of evaluation research, or at least not raise the quality sufficiently to justify the effort and cost of a FC mechanism; we can imagine that with increased regulation over educational research/evaluation activity, there will be stronger tendencies on the part of Federal agencies to engage in forms of "deviant" behavior which inevitably nurture a climate of distrust and will lead to greater, more aversive control measures to ensure compliance with FC regulations; and finally, we can imagine extreme imbalance in the application of FC regulations, for example, with the class of very small data collection activities being examined in the same light and manner as the very large data collection forms. It is known, for example, that 98 reports account for 80 percent of all the responses to all Federal Reports (Lowry, 1975), and the IRS income tax form alone accounts for 32 percent of the total respondent burden; that one data gathering form currently being used by the USOE accounts for 70 percent of the total respondent burden for that agency; and that Federal education contracts account for less than ten percent of the total burden in the Education Division and therefore, much less than that for all reporting requirements of the Federal government. And we can imagine as much scrutiny by OMB FC given to a data collection plan which proposes to gather information from 25 persons as given to a plan which would amass data from 100,000 or more persons.

The challenge of all this is to discover the validity (or invalidity) of these "imaginations" before some of them at least become reality, and then to begin working to influence and better the course of things to come.

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